

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT - RENEWAL

PERMITTEE

Rexam Release
Attn: Amy Craig
1400 Harvester Road
West Chicago, Illinois 60185

Application No.: 86070067

I.D. No.: 043090ABQ

Applicant's Designation:

Date Received: December 11, 2000

Subject: Paper Coating Operation

Date Issued: April 30, 2002

Expiration Date: April 30, 2007

Location: 1450 Northwest Avenue, West Chicago

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of Coater No. 1 and Coater No. 2 with an ARI thermal oxidizer, one mixing room, three 4,000 gallon USTs, one corona treater, Coater No. 1 dryer (4 mmBtu/hr, gas fired), Coater No. 2 dryer (6 mmBtu/hr, gas fired), 15 unit heaters (total 3.26 mmBtu/hr, gas fired) pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of volatile organic material (VOM) and hazardous air pollutants (HAPs) from the source to less than major source thresholds (i.e., VOM to less than 25 tons per year, and HAPs to less than 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits issued for this location.
- 2a. The uncontrolled emissions of volatile organic material (VOM) from two paper coating lines shall be reduced by an overall reduction efficiency of 98.5% of VOM emissions. The afterburner shall have at least a 98.5% efficiency and the capture system shall be a Permanent Total Enclosure (PTE).
- b. The afterburner shall be in operation at all the time during the operation of two coating lines using VOM containing material and shall obtain at least 98.5% overall reduction of VOM.
- c. The thermal afterburner shall be operated in accordance with the requirements of 35 Ill. Adm. Code 218.105(d)(2).
- d. The thermal afterburner combustion chamber shall be preheated to a minimum temperature of 1400°F before the coating process is begun. At least this temperature shall be maintained during the coating operation.

- 3a. Total combined emissions from all paper coating lines, cleanup solvents, solvent mixing booth, storage tanks, and gas combustion units shall not exceed the following limits:

VOM Emissions	
<u>(Lb/Month)</u>	<u>(Ton/Year)</u>
5,000	24.50

These limits are based on coating material usage, cleanup solvent usage and 98.5% control efficiency of the afterburner.

- b. For determination of compliance with the limit of this permit, monthly VOM emissions from two coating lines shall be determined by the following equation:

$$\begin{aligned} \text{Emissions} &= (\text{Coating material including solvent usage}) \times \text{VOM Content} \\ &(\text{lb/month}) \quad (\text{gal/month}) \quad (\text{lb/gal}) \\ &\quad \times (1-0.985) \end{aligned}$$

- c. For determination of compliance with the limits of this permit, monthly VOM emissions from solvent mixing booth shall be determined by the following equation:

$$\begin{aligned} \text{Emissions} &= \text{Mixing booth operating hours} \times \text{Emission factor} \\ &(\text{lb/month}) \quad (\text{hr/month}) \quad (4.91 \text{ lb/hr}) \end{aligned}$$

- d. For determination of compliance with the limits of this permit, monthly VOM emissions from storage tank shall be determined by using standard tank program.
- e. For determination of compliance with the limits of this permit, monthly emissions from gas combustion units shall be determined by using standard AP-42 emission factor.
- f. Compliance with annual limits shall be determined from a rolling total of 12 months of data.
- 4a. The emissions of Hazardous Air Pollutants (HAPs) as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish in rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
- b. Emissions of hazardous air pollutants (HAPs), as listed in Section 112(b) of the Clean Air Act, shall not exceed the following limits:

<u>Item</u>	<u>HAPs Emissions</u>	
	<u>(Lb/Month)</u>	<u>(Tons/Year)</u>
Individual HAP	2,000	9.90
Total HAPs	5,000	24.50

This general HAP emission limit is to restrict the source below major source HAP levels and provide operational flexibility.

- c. These limits define the potential emissions of HAPs and are based on the actual emissions determined from maximum coating and solvent VOM usage, and an 98.5% overall reduction of uncontrolled VOM with at least 98.5% control efficiency of afterburner.
- d. Compliance with annual limits shall be determinable on a monthly basis from the sum of the data for the current month plus the previous 11 months.
- 5. Pursuant to 35 Ill. Adm. Code 218.211(e), the Permittee shall collect and record all of the following information each day and maintain this information at the source for a period of three years from the date of record:
 - a. Control device monitoring data.
 - b. A log of operating time for the capture system, control device and monitoring equipment and the associated run sheets with coating lines.
 - c. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.
- 6a. Within 90 days of written request from the Illinois EPA or USEPA, volatile organic material emissions of the two coating lines shall be measured by an approved testing service, during conditions which are representative of maximum emissions.
- b. The following methods and procedures shall be used for testing of emissions, unless another method is approved by the Illinois EPA: Refer to 40 CFR 60, Appendix A and 40 CFR 61, Appendix B for USEPA test methods.

Location of Sample Points	USEPA Method 1
Gas Flow and Velocity	USEPA Method 2
Volatile Organic Material	USEPA Method 25
- c. The test shall be designed to demonstrate the compliance with the conditions of this permit (i.e., VOM removal efficiency across the afterburner and the overall control efficiency provided by the combination of the control and capture system).
- d. The Illinois EPA shall be notified prior to these tests to enable the Illinois EPA to observe these tests. Notification for the expected date of testing shall be submitted a minimum of thirty (30) days prior to the expected date. Notification of the actual date and expected time of testing shall be submitted a minimum of five (5) working days prior to the actual date of the test. The Illinois EPA may at its discretion accept notifications with shorter advance notice provided that the Illinois EPA will not accept such notifications if it interferes with the Illinois EPA's ability to observe testing.

- e. At least 30 days prior to the actual date of testing a written test plan shall be submitted to the Source Emission Test Specialist.
- f. Copies of the Final Report(s) for these tests shall be submitted to the Illinois EPA within 14 days after the test results are compiled and finalized.
- g. The Final Report shall include as a minimum:
 - i. A summary of results.
 - ii. General information.
 - iii. Description of test method(s), including description of sampling points, sampling train, analysis equipment, and test schedule.
 - iv. Detailed description of test conditions, including:
 - A. Process information, i.e., mode(s) of operation, process rate, e.g., raw material consumption.
 - B. Control equipment information, i.e., equipment condition and operating parameters during testing.
 - C. A discussion of any preparatory actions taken, i.e., inspections, maintenance and repair.
 - v. Data and calculations, including copies of all raw data sheets and records of laboratory analyses, sample calculations, and data on equipment calibration.
 - vi. An explanation of any discrepancies among individual tests or anomalous data.
- h. Submittals of information shall be made as follows:
 - i. Notices of Test - one copy to the Regional Office, and one copy to Compliance Section.
 - ii. Final Report - one copy to the Regional Office, and one copy to Compliance Section.
- 7. The Permittee shall maintain records of the following items:
 - a. Name and identification number, density, weight of VOM and HAP content per volume of each coating material (minus water and any compounds which are specifically exempted from the definition of VOM) and other VOM containing materials used, including solvents.
 - b. Usage of each coating and VOM containing materials including solvents, on a monthly basis and 12 months rolling total basis.
 - c. Operating hours (hr/month and hr/year) of solvent mixing booth.
 - d. Liquid stored in storage tanks, operating temperature, vapor pressure at operating temperature, molecular weight, and monthly throughput (gal/month and gal/year) of storage tanks.

- e. Natural Gas Usage (ft^3/month and ft^3/year).
 - f. Emissions of VOM on a monthly and 12 months rolling total basis.
 - g. Emissions of hazardous air pollutants (individual HAP and total HAPs) on a monthly and 12 months rolling total basis.
8. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
9. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
10. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

11. The Permittee shall submit the following additional information with the Annual Emissions Report, due May 1st of each year:
- a. Natural Gas Usage (ft^3/year).
 - b. Annual VOM emissions on a monthly and 12 months rolling total basis.
 - c. Annual emissions of hazardous air pollutants on a monthly and 12 month rolling total (individual HAP and total HAPs).

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If you have any questions on this, please call John Blazis at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

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cc: Illinois EPA, FOS Region 1
Illinois EPA, Compliance Section
Lotus Notes

Attachment A - Emission Summary

This attachment provides a summary of the maximum emissions from the coating plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are well below the levels, e.g., 25 tons per year of VOM and total HAPs and 10 tons per year of individual HAPs, at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that less material is handled and control measures are more effective than required in this permit.

1. Emissions of volatile organic material (VOM) from all source operations shall not exceed the following limits:

	<u>VOM Emissions</u> <u>(T/Yr)</u>
Coating Operation	24.50

This table defines the potential emissions of volatile organic material and is based on actual emissions determined from maximum material and solvent usage, and at least 98.5% overall control of uncontrolled VOM from the coaters.

2. Emissions of hazardous air pollutants (HAPs), as specified in Section 112(b) of the Clean Air Act, shall not exceed the following limits:

<u>Item</u>	<u>HAPs Emissions</u> <u>(Tons/Year)</u>
Individual HAP	9.90
All HAPs	24.50

3. Emissions from natural gas combustion:

E M I S S I O N S			
<u>NO_x</u> <u>(T/Yr)</u>	<u>CO</u> <u>(T/Yr)</u>	<u>PM</u> <u>(T/Yr)</u>	<u>SO₂</u> <u>(T/Yr)</u>
15.1	12.6	1.2	0.1

This table defines the potential fuel combustion emissions from Coater #1 dryer, Coater #2 dryer, afterburner heating unit and twelve unit heaters and are based on maximum firing rate and natural gas being fired and the emissions were determined by standard emission factors (AP-42).

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